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Attorneys for Plaintiff, JOHN DOBBINS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOHN DOBBINS; individually and as
successor in interest to JENNIFER
DOBBINS, Decedent,

Plaintiff,

vs.

COUNTY OF RIVERSIDE; JOHN
BARTO; and DOES 1-10, inclusive,

Defendants.

Case No.: 5:25-cv-01444-JGB-DTB

*[Honorable Jesus G. Bernal
Magistrate Judge David T. Bristow]*

**REQUEST FOR PLAINTIFF'S
ATTORNEY MARCEL F. SINCICH
TO APPEAR REMOTELY AT THE
SCHEDULING CONFERENCE IN
LIEU OF LEAD TRIAL COUNSEL**

**TO THE HONORABLE COURT, AND ALL PARTIES THROUGH THEIR
ATTORNEYS OF RECORD:**

Plaintiff John Dobbins, by and through his attorneys of record, hereby respectfully requests an order permitting his counsel Marcel F. Sincich to appear remotely on his behalf in lieu of lead trial counsel, Dale K. Galipo, at the Scheduling Conference on October 27, 2025. Plaintiff acknowledges that the Court's Order Setting Scheduling Conference (Dkt. 20) requires that each party be represented at

1 the Scheduling Conference by lead trial counsel. However, Plaintiff submits that
2 good cause exists to allow Mr. Sincich to appear remotely in place of Mr. Galipo at
3 the Scheduling Conference because Mr. Sincich resides out of state and Mr. Galipo
4 will be engaged in trial in Nevada in the matter of *Jeanne Llera, et al. v. Las*
5 *Vegas Metropolitan Police Department*, Nevada District Court Case No. 2:20-cv-
6 01589-RFB-BNW.

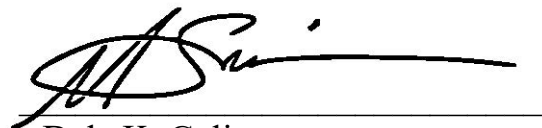
7 Mr. Sincich is familiar with the facts and issues in *this* case, as well as the
8 contents of the parties' Joint Rule 26 Report (Dkt. 17). Mr. Sincich participated in
9 the Rule 26 conference between counsel, drafted the parties' Rule 26 Report, and is
10 well-prepared to represent Plaintiff at the Scheduling Conference. Mr. Sincich will
11 also be handling the law and motion for Plaintiff in this case and will be second-
12 chairing the trial in this matter with Mr. Galipo.

13 For these reasons, Plaintiff respectfully requests that the Court issue an order
14 permitting Mr. Sincich to appear remotely at the Scheduling Conference remotely
15 on October 27, 2025 in lieu of Plaintiff's lead trial counsel Mr. Galipo.

16
17 DATED: October 13, 2025

LAW OFFICES OF DALE K. GALIPO

18
19 By:



Dale K. Galipo

Marcel F. Sincich

Attorneys for Plaintiff, John Dobbins